



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary

Gary K. Hulett, Ph.D., Under Secretary

RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLISTA. GeneralDate January 4, 1989 Time 1300 EPA ID No. KSD091353193Facility Name Coffeyville Re-Con, Inc.Street 2410 Brown StreetCity Coffeyville, Kansas Zip 67337County Montgomery Phone 316/251-1520Contacts Nathan Charles Kudrick - Plant ManagerInspector Bill ToweryOther Mike Kudrick - Safety DirectorB. Hazardous Waste Determination

262.11

1. Does generator generate waste(s) listed in 261.31, 261.32 or 261.33? (YES) NO
 If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart D, and quantity/month:

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal
F003/D001	Waste Barsol Solvent	2 drums/year	USPCI

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)? (YES) NO

- a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
D002	Sodium Hydroxide	4830 lbs.	USPCI
D003		(460 gal @ 10.5 lbs)	
D008	Paint Overspray & Floor Sweep	1100 lbs.	USPCI



b. Do generator determine characteristics by testing or by applying knowledge of processes? Explain below:

1. If determined by testing, did generator use test method 261.21, 261.22, 261.23, or 261.24 or was equivalent test method used? _____

☒ YES ☐ NO ☐ NA

a. If equivalent method used, obtain copy of test method.

3. Are there any other wastes generated by generator?

☒ YES ☐ NO

a. If yes, list below:

<u>Waste Description</u>	<u>Method of Disposal</u>
Waste Oil - 6000 gal/month	National Oil Recycling Springfield, Mo
Waste Treatment Sludge - 7000 gal./6 mos.	Stored

b. Did the generator test these wastes to determine if hazardous?

☒ YES ☐ NO ☐ NA

Explain if necessary:

Oil to be rechecked for EP toxicity

4. Generator size classification:

a. Does firm generate less than 25 kg. of hazardous waste per month (Small quantity generator)?

YES ☒ NO

b. Does firm generate 25 kg. or more but less than 1,000 kg. of hazardous waste per month (Kansas generator)?

YES ☒ NO

c. Does firm generate more than 1,000 kg. of hazardous waste per month (EPA generator)?

☒ YES ☐ NO

Hazardous waste determination requirements:

☒ Adequate ☐ Inadequate

If generator generates less than 25 kg. of hazardous waste per month or accumulates less than 1,000 kg. stop here.

C. Manifest

- 262.21 1. Does generator ship waste off-site? ☒ YES NO
- a. If yes, does manifest include:
1. Manifest document number? ☒ YES NO
2. Generator's name, address, phone number, and EPA ID number? ☒ YES NO
3. Name and EPA ID number of each transporter? ☒ YES NO
4. Name, address, and EPA ID number of designated facility? ☒ YES NO
5. Name, address, and EPA ID number of alternate facility if any. (The generator may also provide instructions to return waste to generator if undeliverable)? YES NO
6. Waste information required by DOT-Shipping name, (49 CFR 172.101, 172.202, 172.203) total quantity, type and number of containers? ☒ YES NO
7. Certification information - "This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable regulations of DOT and EPA"? YES ☒ NO
- 262.23 b. Does generator retain copies of manifest? ☒ YES NO
If yes, complete 1 through 4.
1. Does generator sign and date all manifests by hand? ☒ YES NO
2. Does generator obtain handwritten signature and date of acceptance from initial transporter? ☒ YES NO
3. Does generator retain copy of manifest signed by both generator and transporter? ☒ YES NO
- 262.40 4. Does generator retain copy of manifest signed and dated by T/S/D facility owner/operator for three years? ☒ YES NO

Manifesting requirements:

[X] Adequate [] Inadequate

D. Pre-Transport Requirements

- 262.30 1. Does generator package waste in accordance with DOT requirements (49 CFR 173, 178, and 179)? ☒ YES ☐ NO
- 262.31 2. Does generator label each package in accordance with DOT requirements (49 CFR 172)? ☒ YES ☐ NO
- 262.32 3. Does generator mark each package in accordance with DOT requirements (49 CFR 172)? ☒ YES ☐ NO
4. Does generator mark each container of 110 gallons or less as below: YES ☐ NO ☒
- Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. E.P.A.
Generator's Name and Address _____
Manifest Document Number _____
- 262.33 5. Does generator have placards to offer to transporters (49 CFR 172, Subpart F)? ☒ YES ☐ NO

Pre-transport requirements:

☒ Adequate ☐ Inadequate

E. Record Keeping and Reporting

- 262.40 1. Does generator keep a copy of completed manifests from designated facilities for three years? ☒ YES ☐ NO
2. Does generator keep a copy of each Annual Report and Exception Report for three years? ☒ YES ☐ NO
3. Does generator keep records of test results and waste analyses used in determining hazardous or non-hazardous nature of wastes for three years? ☒ YES ☐ NO

Record keeping and reporting requirements:

☒ Adequate ☐ Inadequate

F. Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? YES ☐ NO ☒

- | | | | | |
|----|--|-----|----|-------------------------------------|
| a. | If yes, has generator filed a notice with the Regional Administrator? | YES | NO | <input checked="" type="radio"/> NA |
| b. | Is waste manifested and signed by foreign cosignee? | YES | NO | <input checked="" type="radio"/> NA |
| c. | If generator transports wastes out of the country, has confirmation of delivered shipment been received? | YES | NO | <input checked="" type="radio"/> NA |

Special conditions requirements:

[] Adequate [] Inadequate X NA

G. Accumulation Time

- | | | | | |
|---------|--|--------------------------------------|-------------------------------------|-------------------------------------|
| 262.34 | 1. Does generator temporarily store waste before transport for 90 days or less? | <input checked="" type="radio"/> YES | NO | NA |
| | a. If yes, is waste placed in containers? | <input checked="" type="radio"/> YES | NO | NA |
| | If yes, | | | |
| | 1. Check overall condition of containers. | | | |
| 265.173 | 2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? Barrels had tops on but not locked with rings | YES | <input checked="" type="radio"/> NO | NA |
| 265.174 | 3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? | <input checked="" type="radio"/> YES | NO | NA |
| 265.176 | 4. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? | <input checked="" type="radio"/> YES | NO | NA |
| 265.177 | 5. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other device? | YES | NO | <input checked="" type="radio"/> NA |
| | b. If yes, is waste placed in tanks? | YES | NO | <input checked="" type="radio"/> NA |
| | If yes, fill out tanks checklist except 265.193. | | | |
| | 2. Is the date accumulation began clearly marked and visible for inspection on each container?
(Need labels on sides of barrels) | <input checked="" type="radio"/> YES | NO | NA |

3. Is each container and tank labeled and marked clearly with the words "Hazardous Waste"?

(YES) NO NA

Note: If storage period exceeds 90 days then the facility is also a T/S/D facility. If facility is a T/S/D, go to T/S/D checklist here.

Accumulation time requirements:

[X] Adequate [] Inadequate [] Not Applicable

If generator is a Kansas generator stop here.

H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)

1. Does the owner/operator maintain at the facility, the following documents and records:
 - a. Job title and job description for each position related to hazardous waste management? (YES) NO
 - b. Description of type and amount of training to be given each person? (YES) NO
 - c. Records of training given to facility personnel? YES (NO)
No individual training documentation

Personnel training requirements:

[] Adequate [X] Inadequate [] Not Applicable

2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):

265.31

- a. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES (NO)
- b. If applicable to the facility, is the facility equipped with:
 1. Internal communication or alarm system easily accessible in case of emergency? Air Horn (YES) NO NA
 2. (Telephone) hand-held two-way radio capable of summoning emergency response personnel? (YES) NO NA

- | | | | | | |
|--------|----|--|--------------------------------------|--------------------------|-------------------------------------|
| | c. | Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | d. | Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.33 | e. | Is this equipment (a-d above) tested and maintained to assure its proper operation? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.35 | f. | Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| 265.37 | g. | If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | h. | In areas where more than one police and fire department might respond, is there one designated authority? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | i. | If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response contractors, and equipment suppliers? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | j. | If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries which could result from fires, explosions, or releases at the facility? | <input checked="" type="radio"/> YES | <input type="radio"/> NO | <input type="radio"/> NA |
| | k. | In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? | <input type="radio"/> YES | <input type="radio"/> NO | <input checked="" type="radio"/> NA |
| | | (Letters returned) | | | |

Preparedness and prevention requirements:

☒ Adequate ☐ Inadequate ☐ Not Applicable

3. The generator who accumulates waste on-site must also meet the contingency plan and emergency procedures requirements (Subpart D):

265.53

- a. Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services?

(YES) NO

265.52

- b. Does the plan describe arrangements made with emergency response personnel?
- c. Does the plan list the name(s), home address, and phone numbers of designated emergency coordinator(s)?
- d. Is an emergency coordinator available at all times?
- e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities?
- f. Does the plan include an evacuation plan for facility personnel?

(YES) NO

(YES) NO

(YES) NO

(YES) NO

(YES) NO

Contingency plan and emergency procedures requirements:

[X] Adequate [] Inadequate [] Not Applicable

Note: Determine if generator claims any information confidential.

Note: Complete section "I" only for those generators that also transport hazardous waste. This section should also be used for commercial transporting companies.

I. Transporter Requirements

1. In addition to the requirements for manifests given in section C(1)(a)(1) through section C(1)(a)(6) above, does the manifest include:

263.20

- a. Signature of subsequent transporters, if any? YES NO NA
- b. Signature signifying proper delivery to designated or alternate designated facility? YES NO

2. If the transporter transports wastes outside of U.S. do manifests show date waste left U.S.? YES NO NA

263.22

3. Does transporter keep copy of the manifest signed by generator, himself, and the next designated transporter or owner of T/S/D facility for three years? YES NO

4. Are containers properly labeled and marked in accordance with DOT requirements (49 CFR 172)?

YES NO

5. Are vehicles properly placarded (49 CFR 172.500)?

YES NO

Transporter requirements:

☐ Adequate ☐ Inadequate ☐ Not Applicable

Additional Information and CONCLUSIONS Facility is a drum reconditioner. They
clean about 2,000 drums each day. Used drums or barrels are first stripped of all
labels by hand and then their exteriors are cleaned with a caustic solution (NaOH).
Bungs are removed and any contents drained to the oil storage tanks. Interiors are
then steam cleaned and dried. Tops are then ground and any rusty barrels are rinsed
with a hydrochloric acid rinse with rinsewater flowing to a lift station where it is
pumped up into three separator tanks for pH adjustment prior to discharge to the cit
sewer system. The caustic solution used in phase I is recirculated and replenished a
needed. Sludge (D002) from this tank is cleaned out and stored in 55-gallon barrels
for later pickup by USPCI. The oily water mixture from the steam cleaning operation
flows to a separator where oil is separated and pumped to storage tanks. Water is
reheated and reused.

Form: GT 1/84
81-J